## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA (Lynchburg Division)

| TRE'MANE I | FUOUA | ١. |
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Plaintiff,

v.

Case No. 6:23-cv-00065

CENTRA HEALTH, INC., et al.

Defendants.

## CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT CENTRA HEALTH, INC. TO FILE RESPONSIVE PLEADINGS

Defendant Central Health, Inc. ("Centra"), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby files this Consent Motion respectfully requesting that the Court enter an Order extending the time for the Centra to file its responsive pleadings. In support of the requested relief, Centra states as follows:

- 1. Plaintiff Tre'Mane Fuqua ("Plaintiff") served Centra with the Complaint in this case on January 11, 2024.
  - 2. Centra's responsive pleadings would be due on February 1, 2024.
- 3. Centra is in the process of reviewing its file and needs additional time to determine whether certain defenses should be asserted under Federal Rule of Civil Procedure 12(b).
- 4. Plaintiff's counsel has consented to Centra's request to extend its responsive pleadings deadline to March 1, 2024.

WHEREFORE, Centra respectfully requests that the Court enter an Order extending its responsive pleading deadline to March 1, 2024.

Respectfully submitted,

CENTRA HEALTH, INC.

/s/ Jamie H. Wood

Elizabeth Guilbert Perrow (VSB No. 42820) J. Benjamin Rottenborn (VSB No. 84796) Jamie H. Wood (VSB No. 97297) WOODS ROGERS VANDEVENTER BLACK PLC P.O. Box 14125 Roanoke, VA 24038-4125

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## **CERTIFICATE OF SERVICE**

I certify that on January 30, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Jamie H. Wood